

United States District Court  
Eastern District of Michigan  
Northern Division

United States of America,

Plaintiff,

Case No. 20-20517

v.

Hon. Denise Page Hood  
Stephen Shipps,

Defendant.

/

**Addendum to the Plea Agreement**

As part of the plea agreement in this case, the parties agree that the following language shall supersede and replace paragraph 8.C of the Plea Agreement (Plea Agreement, ECF No. 24, PageID 112–113):

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**8.C Other Guideline Recommendations**

The parties also recommend under Federal Rule of Criminal Procedure 11(c)(1)(B) that the following guideline provisions apply:

- Pursuant to USSG §2G1.1(a)(1) (Nov. 2001), the defendant's base offense level is 19;

- Pursuant to USSG §2G1.1(b)(2) (Nov. 2001), the defendant's guideline range is increased by two levels because MV-1 was 15 years old when defendant began engaging in sexually inappropriate activity with her;
- Pursuant to USSG §3B1.3, the defendant's guideline range is increased by two levels because defendant abused his position of trust (to wit: as MV-1's violin teacher and mentor) and used a special skill (to wit: his expertise in violin) to facilitate the commission of the offense;
- Pursuant to USSG §4B1.5(b) (Nov. 2001), the defendant's guideline range is increased by 5 levels because he engaged in a pattern of activity involving prohibited sexual conduct.

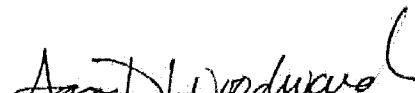
The parties have no other recommendations as to the defendant's guideline calculation.

Dawn N. Ison  
United States Attorney



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Benjamin Coats  
Chief, Major Crimes Unit  
Assistant U.S. Attorney



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Sara D. Woodward  
Assistant U.S. Attorney

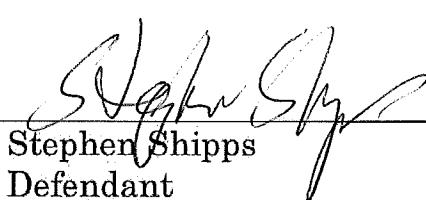
Dated: April 6, 2021



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John Shea  
Attorney for Defendant

Dated: 4/6/22



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Stephen Shipps  
Defendant